

BAKER BOTTS LLP

30 ROCKEFELLER PLAZA
NEW YORK, NEW YORK
10112-4498

TEL +1 212.408.2500
FAX +1 212.408.2501
BakerBotts.com

AUSTIN	LONDON
BEIJING	MOSCOW
BRUSSELS	NEW YORK
DALLAS	PALO ALTO
DUBAI	RIYADH
HONG KONG	SAN FRANCISCO
HOUSTON	WASHINGTON

October 18, 2022

Hon. Vernon S. Broderick
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Brendan F. Quigley
TEL: 2124082520
FAX: 2122592520
brendan.quigley@bakerbotts.com

US v. John Graves, 22 Cr. 142 (VSB)

Dear Judge Broderick:

We represent John Graves in this matter. Mr. Graves was released on June 24, 2022, on a personal recognizance bond. Mr. Graves is under home incarceration with pretrial supervision and travel restricted to the Southern and Eastern Districts of New York. Mr. Graves is also undergoing drug testing and treatment.

Mr. Graves is charged in this case with a non-violent drug offense and has been compliant with the conditions of his release over the last three, going on four, months.

We respectfully request that Mr. Graves be allowed to be released from home incarceration to go trick or treating with his children on the afternoon of October 30 on Roosevelt Island.

Pre-trial Services objects to this request, citing its standing policy of “object[ing] to all leave requests for social purposes for defendants subject to home incarceration,” and not any circumstances unique to Mr. Graves. The government defers to the position of Pre-Trial Services.

We appreciate the Court’s consideration.

Respectfully submitted,

APPLICATION DENIED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 10/26/2022

/s/ Brendan F. Quigley
Brendan F. Quigley
Partner | Baker Botts LLP
Tele: (212) 408-2520
Mobile: (917) 885-8069
brendan.quigley@bakerbotts.com